

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Paris Shoots, Jonathan Bell, Maxwell
Turner, Tammy Hope, Phillipp
Ostrovsky, Brenda Brandt, Anissa
Sanders, Najai McCutcheon,
and Leticia Rodriguez, on behalf of
themselves, the Proposed Rule 23 Classes,
and others similarly situated,

Court File No. 0:15-cv-00563-SRN-SER

NOTICE OF SETTLEMENT

Plaintiffs,

v.

iQor Holdings US Inc.,

Defendant.

The parties are pleased to report that they have reached a memorandum of understanding to resolve the above-captioned matter. Accordingly, the parties respectfully request that all pending case deadlines be vacated. The parties will finalize their settlement agreement and file a joint motion for preliminary approval of the settlement within 60 days.

The parties agree that the statute of limitations of the FLSA collective and putative Rule 23 class members are tolled until final settlement approval is granted.

Any agreed-upon stay to facilitate Court consideration of a proposed settlement will not be used in any later litigation by either party to suggest any tolling doctrines do or do not apply generally to the claims.

A proposed order will be email separately to Chambers.

Respectfully Submitted,

Dated: July 9, 2018

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